



## California Stormwater Quality Association®

*Dedicated to the Advancement of Stormwater Quality Management, Science and Regulation*

February 27, 2012

Dave Woelfel  
Santa Ana Regional Water Quality Control Board

**Subject: Basin Plan Amendments to Revise Recreation Standards for Inland Fresh Surface Waters in the Santa Ana Region**

Dear Mr. Woelfel,

The California Stormwater Quality Association (CASQA<sup>1</sup>) is pleased to recognize the efforts of the Stormwater Quality Standards Task Force, which was convened in 2003 to review the water quality standards related to swimming and recreational uses in the Santa Ana region's streams and rivers. Through a multi-year effort involving a wide range of stakeholders, the Task Force has evaluated the science underlying water quality criteria for bacteria, has conducted comprehensive evaluations of the ability of the region's water bodies to support swimming and other recreational uses, and has considered a wide range of potential implementation options.

CASQA believes that the proposed Basin Plan Amendments will help assure that human health will be protected and that public resources will be expended reasonably and fairly. The Amendments update the region's water quality objectives for indicator bacteria to conform to USEPA's recommended criteria, and the amendments incorporate a narrative objective to assure that waste discharges do not contain human pathogens at levels that will increase the risk of illness. The proposed changes recognize that some waters are commonly used for swimming and other recreational activities, while others are used infrequently, if at all. Finally, the proposed amendments acknowledge that recreational activities are unsafe in some streams during wet weather and regulate those streams accordingly.

CASQA commends the Santa Ana Regional Water Board for its efforts with the Stormwater Quality Standards Task Force. This model effort has established a firm scientific foundation for the future effective management and protection of highly modified urban streams in the Santa Ana River Watershed and has done so in a manner that is open and transparent.

We thank you for your consideration of our comments and congratulate you for your commitment to environmental protection, sound science, and prudent public policy.

Sincerely,

Richard Boon, Chair - California Stormwater Quality Association

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<sup>1</sup> CASQA is comprised of stormwater quality management organizations and individuals, including cities, counties, special districts, industries, and consulting firms throughout California. Our membership provides stormwater quality management services to more than 23 million people in California. CASQA was originally formed in 1989 as the Stormwater Quality Task Force to recommend approaches for stormwater quality management to the California State Water Resources Control Board.